



January 23, 2004

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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5090.3a

Mr. Mark Krivansky
Engineering Field Activity Northeast
Naval Facilities Engineering Command
10 Industrial Hwy., Mail Stop #82
Lester, PA 19113-2090

Subject: Navy Responses to EPA comments on the Draft Remedial Action Work Plan
Report for Rubble Disposal Area, Operable Unit 2, Naval Air Station South
Weymouth, Weymouth, Massachusetts

Dear Mr. Krivansky:

The United States Environmental Protection Agency (EPA) has reviewed the Navy's responses dated August 11, 2003 to EPA comments dated July 21, 2003 on the Draft Remedial Action Work Plan for the Rubble Disposal Area (RDA), Operable Unit 2, Naval Air Station South Weymouth, dated June 2003.

The responses were reviewed for consistency, technical accuracy and completeness. For those responses deemed satisfactory, no additional comments have been made. For those responses deemed inadequate EPA responses are in Attachment 1 of this letter.

Please note that this document, in part or in whole, constitutes the Primary Document that is required to be submitted in the remedial design phase of the cleanup at the RDA site under the Federal Facility Agreement (FFA) for the Site. The Navy and EPA signed a Record of Decision for the RDA on December 31, 2003. Therefore, the Navy's submission at this time of any document relating to remedial design for this site is in compliance with CERCLA, the National Contingency Plan and the FFA. If you have any questions, please contact me at (617) 918-1382.

Sincerely,

Patty Marajh-Whittemore
Remedial Project Manager
Enclosure

cc: Dave Barney/Mark Leipert/ SOWEY NAS
Dave Chaffin/MADEP
Bryan Olson/Leann Jensen/Bill Brandon/Steve DiMattei/Rick Sugatt/EPA
John Rogers/SSTTDC
RAB Members
Peter Golonka/Gannett Fleming

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ATTACHMENT 1

EPA GENERAL COMMENTS

EPA General Comment # 2 Response Evaluation: Please specify the accuracy of the GPS equipment to be used. Also, please incorporate the plan to use GPS equipment into the Work Plan.

EPA SPECIFIC COMMENTS

EPA Specific Comment # 1 Response Evaluation: Page 2-4, §2.4 of the Final Work Plan- Please note that the text has not been changed as indicated in the response. Please make sure the actions specified in the response are implemented for this project.

EPA Specific Comment # 19 Response Evaluation: All of the Submittal Register items for Specifications 01200N through 01770N are missing. Please explain why or add these items back into the Submittal Register. Also, there are still items required by the specifications that are not included in the submittal register, including but not limited to Specification 02525N and 02921N. Please review and correct the Submittal Register to include all the specification requirements.

EPA Specific Comment # 20 Response Evaluation: Without a more comprehensive screening program, EPA reserves the right to conduct random testing of the common and select fill material to verify the absence of contamination. Should testing verify the presence of contamination, construction may be put on hold until additional testing of in-place material has been completed to identify the extent of the contamination problem. Placed contaminated material will be subject to removal and disposal, if necessary, at Navy's expense.

EPA Specific Comment # 28 Response Evaluation: Appendix E - The decision criteria for the exploratory upland soils should be the same as the decision criteria for hydric soils because the receptors in hydric soil will be the same in the adjacent upland soils. To reiterate previous EPA comments, the decision criteria for hydric soil across the entire wetland (**including the area of excavation**) and in the area of excavation it self are: 1) less than or equal to 1 ppm total PCBs by EPA Method 8082 analysis, measured as the simple arithmetic average, and 2) no more than 8 ppm total PCBs by EPA Method 8082 analysis. EPA emphasizes that PCBs should be expressed as total PCBs, not only Aroclor 1260, and that all Aroclors should be quantified.

EPA Specific Comment # 29 Response Evaluation: Please refer to the discussion for Specific Comment 28.

EPA Specific Comment # 30 Response Evaluation: It should be noted that the kits are cogener-specific in terms of sensitivity to PCBs. Therefore, assuming a kit is selected to maximize the response to Aroclor 1260, for example, the response to other cogeners will be less

sensitive and the sensitivity will decrease with decreasing chlorine content. Therefore, it is assumed that the Navy's discussion is focused on detection limits for the specific cogener for which the kits have been selected. Achieving reasonable detection limits for other cogeners will be problematic.

EPA Specific Comment # 31 Response Evaluation: See response to Specific Comment 30.

EPA Specific Comment # 38 Response Evaluation: For several reasons, the proposed excavation plan is not acceptable. First, the excavation needs to be oriented parallel with the slope of the landfill. This is even more evident based on the new topography resulting from the latest site survey. The hypothesis is that contamination at BSD-4 and BSSD-46 resulted from erosion down the landfill slope. Consequently, excavation should occur parallel with the slope not almost perpendicular to the slope. Second, the locations for BSD-4 and BSSD-49 are not as depicted in Figure 1-2. BSD-4 is approximately four feet farther north than shown, and BSSD-46 is actually north of the center of the second quadrant from the north (approximately 14 feet farther north than shown). Third, the plan in Figure 1-2 locates the boundary of the excavation near the hot spots. It would be more appropriate to center the excavation around the hot spots, in part because the accuracy of the GPS coordinates needs to be considered. An accuracy of plus or minus a few feet (note that the GPS coordinates were collected several years ago) could put the hot spot outside the proposed excavation.

EPA Specific Comment # 39 Response Evaluation: As requested originally, please provide the accuracy of the GPS coordinates for the two hot spots based on when the GPS coordinates were originally collected (1996 and 1999). It is not at all apparent that the proposed excavation will encompass the two hot spots without accuracy information for the GPS coordinates. Also, please refer to the rebuttal comment to the response to Specific Comment 39.

EPA Specific Comment # 41 Response Evaluation: Refer to response to Specific Comment 28 and 30.